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September 27, 2023

VIA ECF:

The Honorable Martin Glenn, Chief Bankruptcy Judge  
United States Bankruptcy Court for the Southern District of New York  
One Bowling Green  
New York, NY 10004-1415  
[mg.chambers@nysb.uscourts.gov](mailto:mg.chambers@nysb.uscourts.gov)

Re: *In re Celsius Network LLC, et al.*, Case No. 22-10964 (MG) – Written Request to make  
Opening Statement at Confirmation Hearing

Dear Chief Judge Glenn:

Offit Kurman, P.A. is counsel to the Ad Hoc Group of Earn Account Holders (the “**Ad Hoc Earn Group**”) in the above-referenced chapter 11 cases. The Ad Hoc Earn Group writes pursuant to paragraph 1 of the Order Establishing Case Management Procedures for the Confirmation Hearing [Dkt. No. 3478] (the “**Confirmation Procedures Order**”) to request that the Court permit the Ad Hoc Earn Group through its counsel to make an opening statement (the “**Opening Statement**”) in support of confirmation of the Joint Chapter 11 Plan of Reorganization of Celsius Network LLC and its Debtor Affiliates [Dkt. No. 3319] (the “**Plan**”). Specifically, the Ad Hoc Earn Group requests ten minutes for its Opening Statement at the Confirmation Hearing.

Respectfully,

/s/ Joyce A. Kuhns  
Joyce A. Kuhns